

# FLYNN & WIETZKE, P.C.

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January 19, 2023

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

RE: RAMON OLIVERAS V. LONG ISLAND RAILROAD COMPANY  
22 Civ. 4600 (LGS)(GWG)

Dear Judge Schofield:

We are plaintiff's counsel in the above-entitled case and write jointly with defendant pursuant to the Court's Order of August 2, 2022 (Docket 9) to provide a status report.

Plaintiff has responded to all discovery demands and has made his expert witness disclosure. Plaintiff has deposed two defense witnesses. Defendant would like to depose plaintiff and is scheduling a date.

Although defendant has produced some limited documents, including the accident investigation report and plaintiff's handwritten statement, they have not provided formal responses to Plaintiff's Requests for Production of Documents or Interrogatories. Plaintiff has not been provided with such basic information as the LIRR Medical Department File and any sick pay lien information. Yesterday defendant designated an expert to conduct plaintiff's medical examination and we are in the process of scheduling the appointment.

Neither party will be filing any dispositive motion.

Very truly yours,



Sean Constable

SC:EF  
cc: William Blumenschein, Esq.